

**To:** Rao, Kate[Rao.kate@epa.gov]  
**Cc:** Albright, David[Albright.David@epa.gov]; Rumrill, Nancy[Rumrill.Nancy@epa.gov]; Shari.Ring@cadmusgroup.com[Shari.Ring@cadmusgroup.com]  
**From:** JAMES D WALKER  
**Sent:** Thur 12/7/2017 8:06:46 PM  
**Subject:** RE: Contract No. EP-C-15-022, Workplan Assignment No. 2-90 -- Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application [Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ3-FY16-1]

Hi Kate,

I am available Friday, 12/ 15, at noon PST or later or anytime on 12/18 for the call with EPA and Excelsior. I have personal business that would conflict with a call on 12/14. I may need some additional time to prepare for and follow-up to the call if it requires an extensive review of the basis and background of the topics for discussion.

Thanks,

Jim

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**From:** Rao, Kate <Rao.kate@epa.gov>  
**Sent:** Thursday, December 7, 2017 12:08:46 PM  
**To:** JAMES D WALKER; Shari.Ring@cadmusgroup.com  
**Cc:** Albright, David; Rumrill, Nancy  
**Subject:** FW: Contract No. EP-C-15-022, Workplan Assignment No. 2-90 -- Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application [Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ3-FY16-1]

Hi Jim –

Are you available to participate on a conference call/webinar with EPA and Excelsior on either Thursday, 12/14 or Friday, 12/15? **Ex. 4 - CBI** to coordinate with Nancy on topics/agenda prior to call; **Ex. 4 - CBI**s for conference call; and **Ex. 4 - CBI** or written summary/follow-up.

If 12/14 or 12/15 doesn't work, are you free on 12/18?

The below TDM is still active and includes Task 5 Consultation.

Please advise on your availability.

Thanks. Kate

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Kate Rao  
Drinking Water Protection Section (WTR 3-2)  
USEPA Region 9  
75 Hawthorne St., San Francisco, CA 94105  
tel: (415) 972-3533 / fax: (415) 947-3549

**From:** Rao, Kate  
**Sent:** Wednesday, June 28, 2017 9:41 AM  
**To:** Shari.Ring@cadmusgroup.com  
**Cc:** JAMES D WALKER Ex. 6 - Personal Privacy; Mitchell-Flinn, Lisa <Mitchell-Flinn.Lisa@epa.gov>; Parrotta, Nancy <Parrotta.Nancy@epa.gov>; Albright, David <Albright.David@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Mills, Noelle <Mills.Noelle@epa.gov>; Greenberg, Leslie <Greenberg.Leslie@epa.gov>  
**Subject:** Contract No. EP-C-15-022, Workplan Assignment No. 2-90 -- Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application [Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ3-FY16-1]

Hello Shari - Below is a work initiation request for WA 2-90 (start date July 1, 2017). I am sending this today as I will be out of the office starting June 30 and will not return until July 11<sup>th</sup>.

If you have any clarifying questions, please let me know.

Regards – Kate

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**Contract No. EP-C-15-022, Workplan Assignment No. 2-90 -- Technical Direction:  
Excelsior Gunnison Copper Project Class III UIC Permit Application**

**R9 Tech Support for Implementation of the UIC Program – Excelsior Mining Company -  
Class III UIC Permit #R9UIC-AZ3-FY16-1**

**Task 1.2 (Tech Review Analysis) & Task 4 (Project Technical Reviews) & Task 5  
(Consultation)**

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**Technical Direction**

**Background:** Excelsior submitted a revised UIC area permit application in June 2017 to operate a Class III ISR copper mining facility in Chochise County, AZ.

**Action:** EPA is seeking technical support to evaluate Excelsior's revised permit application and propose the terms and conditions of the draft permit. Below details the support that is needed.

**Technical Review and Draft Permit Technical Terms and Conditions**

**Task 1.2 (Technical Review Analysis)**

**Draft Permit Technical Terms and Conditions**

Based on Excelsior's revision of the UIC application, Cadmus will update and complete the draft technical terms and conditions to be imposed in the draft permit -operational, monitoring, testing, reporting, etc. for the Proposed Excelsior Gunnison Copper Project. The permit for Florence Copper was be used as an example to structure the content for the draft Gunnison Copper Project permit. Put in any additional place holders or highlights for any conditions that may be subject to change upon receipt of any supplemental response. Compare the ADEQ draft APP permit to the proposed draft UIC permit conditions to identify potential conflicts or

discrepancies.

- ☐ Deliverable: a. Comments identifying potential conflicts or discrepancies in the ADEQ draft APP to our draft permit terms and conditions.

b. Draft permit technical terms and conditions. Identify information from the revised application to reference for draft permit appendices.

- ☐ Due Date: **Ex. 4 - CBI** for a. **Ex. 4 - CBI** for b. updated draft (via email to Kate Rao, Nancy Rumrill & David Albright).
- ☐ **Ex. 4 - CBI**
- ☐ Materials: Excelsior Gunnison Copper Project revised UIC permit application, redline e-copy of revised application, and prior responses already provided to Cadmus (Jim Walker) during WA 1-90 period. ADEQ draft permit at <http://azdeq.gov/public-notice-decision-issue-individual-app-gunnison-copper-project>

**Under Task 4 (Project Technical Review)**, the contractor shall provide technical review for revised Excelsior Class III permit documentation and supporting material. The contractor shall incorporate any comments from EPA and shall provide a final draft to the EPA WACOR.

- ☐ Material: Additional material as provided by the applicant.
- ☐ **Ex. 4 - CBI**
- ☐ Deliverable: Prepare written comments in a format agreed upon when tech review is requested.
- ☐ Schedule: 1 – 2 weeks for each request unless noted otherwise.

**Under Task 5 (Consultation)**, the contractor shall make available a staff person to consult, directly with EPA staff and/or on calls with EPA & applicant, on the Excelsior Class III permit application and supporting material. Under this task, Cadmus (Jim) should identify any clarifications as he's reviewing the revised application and supporting materials to review before the call with EPA and for discussion with Excelsior during the call.

- ☐ Material: Will be sent prior to call or discussed on call.
- ☐ **Ex. 4 - CBI** per call (includes prep time)
- ☐ Deliverable: Summary of consultation support -- noted in monthly progress report and if possible, within 5 working days of the conference call, send draft notes to EPA via email.

- a. Call scheduled every two weeks on Thursday, next call July 6 from 10:00 am to 12:00 noon. Pre-discussion and de-brief discussion may be requested (TBD) and will be organized by Nancy Rumrill as needed.
- Material to review: Any clarifications of the revised application.
  - Ex. 4 - CBI (includes prep and calls)
  - Deliverable: written summary of consultation provided on call.

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